

**Annex A**

**Proposed Scheduling and Notice Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u></b>	: <b>08-13555 (JMP)</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
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**ORDER SCHEDULING A DISCLOSURE STATEMENT HEARING AND  
APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

Upon the motion (the “Motion”)<sup>1</sup> dated March 29, 2011 of the Ad Hoc Group of Lehman Brothers Creditors (the “Group”), pursuant to sections 105, 502, 1125, 1126, and 1128 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2002, 3017, 3018, 3020, 9013, 9014 and 9021 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2002-1, 3017-1, 3018-1, 3020-1, 9013-1 and 9021-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), for entry of (i) an order scheduling a disclosure statement hearing and approving the form and manner of notice thereof and (ii) an order approving the Disclosure Statement for the Joint Substantively Consolidating Plan (as it may be further amended or modified, the “Group’s Plan”) for Lehman Brothers Holdings Inc. and Certain of Its Affiliated Debtors Other Than Merit, LLC, LB Somerset LLC and LB Preferred Somerset LLC dated December, 15 2010 (as may be amended, modified and/or supplemented from time to time, the “Group’s Disclosure Statement”), all as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Standing Order M-61 Referring to Bankruptcy Judges for the Southern District of

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

New York Any and All Proceedings Under Title 11, dated July 10, 1984 (Ward, Acting C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. § 1408 and 1409; and due and proper notice of the Motion having been provided in accordance with the procedures set forth in the second amended order entered June 17, 2010 governing case management and administrative procedures [Docket No. 9635]; and the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is hereby

ORDERED that a hearing to consider the Group's Disclosure Statement shall be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **June 28, 2011 at 10:00 a.m. (Eastern Time)**; and it is further

ORDERED that objections and responses, if any, to the Group's Disclosure Statement must be filed and served as to be received no later than **May 27, 2011 at 4:00 p.m. (Eastern Time)**; and it is further

ORDERED that replies or an omnibus reply to objections and responses, if any, to the Motion must be filed and served so as to be received no later than **June 21, 2011 at 4:00 p.m. (Eastern Time)**; and it is further

ORDERED that service of the Group's Disclosure Statement Notice, the form of which is hereby approved, pursuant to the procedures set forth in the Motion, constitutes good and sufficient notice to all parties in interest of the Group's Disclosure Statement Hearing and

the Group's Disclosure Statement Objection Deadline and no other or further notice need be provided.

Dated: \_\_\_\_\_, 2011  
New York, New York

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**Group's Disclosure Statement Notice**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
:   
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
:   
**Debtors.** : **(Jointly Administered)**  
-----X

**NOTICE OF HEARING TO CONSIDER APPROVAL OF DISCLOSURE STATEMENT  
WITH RESPECT TO THE JOINT SUBSTANTIVELY CONSOLIDATING CHAPTER  
11 PLAN FOR LEHMAN BROTHERS HOLDINGS INC. AND CERTAIN OF ITS  
AFFILIATED DEBTORS OTHER THAN MERIT, LLC, LB SOMERSET LLC  
AND LB PREFERRED SOMERSET LLC FILED BY THE  
AD HOC GROUP OF LEHMAN BROTHERS CREDITORS**

TO PARTIES IN INTEREST IN THE FOLLOWING CHAPTER 11 CASES:

**Name of Debtors and Case Numbers**

Lehman Brothers Holdings Inc.	08-13555 (JMP)
Lehman Commercial Paper Inc.	08-13900 (JMP)
Lehman Brothers Commodities Services Inc.	08-13885 (JMP)
Lehman Brothers Special Financing Inc.	08-13888 (JMP)
Lehman Brothers OTC Derivatives Inc.	08-13893 (JMP)
Lehman Brothers Commercial Corporation	08-13901 (JMP)
Lehman Brothers Derivatives Products Inc.	08-13899 (JMP)
Lehman Brothers Financial Products Inc.	08-13902 (JMP)
LB 745 LLC	08-13600 (JMP)
PAMI Statler Arms LLC	08-13664 (JMP)
CES Aviation LLC	08-13905 (JMP)
CES Aviation V LLC	08-13906 (JMP)
CES Aviation IX LLC	08-13907 (JMP)
East Dover Limited	08-13908 (JMP)
Lehman Scottish Finance L.P.	08-13904 (JMP)
Luxembourg Residential Properties Loan Finance S.a.r.l.	09-10108 (JMP)
BNC Mortgage LLC	09-10137 (JMP)
LB Rose Ranch LLC	09-10560 (JMP)
Structured Asset Securities Corporation	09-10558 (JMP)
LB 2080 Kalakaua Owners LLC	09-12516 (JMP)

PLEASE TAKE NOTICE THAT on December 15, 2010, the Ad Hoc Group of Lehman Brothers Creditors (the “Group”) filed the Joint Substantively Consolidating Chapter 11 Plan for Lehman Brothers Holdings Inc. and Certain of Its Affiliated Debtors Other Than Merit, LLC, LB Somerset LLC and LB Preferred Somerset LLC (as it may be further amended, the “Group’s Plan”) and the Group’s Disclosure Statement for the Joint Substantively Consolidating Chapter 11 Plan for Lehman Brothers Holdings Inc. and Certain of Its Affiliated Debtors Other Than Merit, LLC, LB Somerset LLC and LB Preferred Somerset LLC (as it may be amended, the “Group’s Disclosure Statement”) with respect to the Group’s Plan, pursuant to section 1125 of title 11 of the United States Code (the “Bankruptcy Code”).

PLEASE TAKE FURTHER NOTICE that:

1. A hearing will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), One Bowling Green, New York, New York 10014, on **June 28, 2011 at 10:00 a.m. (Eastern Time)** (the “Disclosure Statement Hearing”) to consider the entry of an order, among other things, determining that the Group’s Disclosure Statement contains “adequate information” within the meaning ascribed to such term in section 1125 of the Bankruptcy Code and approving the Group’s Disclosure Statement.

2. Any party in interest wishing to obtain a copy of the Group’s Disclosure Statement and the Group’s Plan may request such copy, in writing, from **Epiq Bankruptcy Solutions, LLC, Attn: Lehman Ballot Processing Center, 757 Third Avenue, 3rd Floor, New York, New York 10017**. Interested parties may also examine the Group’s Disclosure Statement and the Group’s Plan free of charge at [www.lehman-docket.com](http://www.lehman-docket.com). In addition, the Group’s Disclosure Statement and the Group’s Plan are on file with the Bankruptcy Court and may be examined by accessing the Bankruptcy Court’s website: [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov). Note that a PACER password and login are needed to access documents on the Bankruptcy Court’s website. A PACER password can be obtained at: [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov).

3. Objections and responses, if any, to approval of the Group’s Disclosure Statement, must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, and the *Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures*, dated June 17, 2010 [Docket No. 9635], (c) set forth the name(s) of the objecting party/(ies), (d) set forth the nature and amount of the claim(s) or equity interest(s) held or asserted by each objecting party/(ies) against the Debtor(s), (e) state with particularity the legal and factual bases relied upon for the objection or response, and (f) be filed, together with proof of service, with the Bankruptcy Court and served **so that they are actually received by the following parties no later than May 27, 2011 at 4:00 p.m. (Eastern Time)**: (i) the **chambers of the Honorable James M. Peck, United States Bankruptcy Judge**, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) **White & Case LLP**, 1155 Avenue of the Americas, New York, New York 10036, Attn: Gerard Uzzi, Esq. and J. Christopher Shore, Esq., attorneys for the Group; (iii) the **Office of the United States Trustee** for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Elisabetta Gasparini, Esq. and Andrea

Schwartz, Esq.; (iv) **Millbank, Tweed, Hadley & McCloy**, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq., attorneys for the official committee of unsecured creditors; and (v) **Weil Gotshal & Manges LLP**, 767 Fifth Avenue, New York, New York 10153, Attn: Harvey R. Miller, Esq., Lori R. Fife, Esq., and Alfredo R. Pérez, Esq., attorneys for the Debtors.

**IF AN OBJECTION OR RESPONSE TO APPROVAL OF THE GROUP'S DISCLOSURE STATEMENT IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE GROUP'S DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE DISCLOSURE STATEMENT HEARING.**

4. Upon approval of the Group's Disclosure Statement by the Bankruptcy Court, any party in interest that is entitled to vote on the Group's Plan will receive a copy of the Group's Disclosure Statement, the Group's Plan and various documents related thereto, unless otherwise ordered by the Bankruptcy Court.

5. The Disclosure Statement Hearing may be adjourned from time to time without further notice to parties in interest other than by announcement in Bankruptcy Court of such adjournment on the date scheduled for the Group's Disclosure Statement Hearing or as indicated in any notice of agenda of matters scheduled for hearing or such other notice as may be filed with the Bankruptcy Court.

DATED: [DATE], 2011  
New York, New York

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